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5 Attorney for Jeri Coppa-Knudson, Trustee

6 **UNITED STATES BANKRUPTCY COURT**

7 **DISTRICT OF NEVADA**

8
9 IN RE: CASE NO. BK-N-14-50331-BTB
10 AT EMERALD, LLC, CHAPTER 7
11 Debtor.

**STIPULATION TO EXTEND PERIOD OF
LIMITATIONS**

12 **Hearing Date:** N/A
Hearing Time:

13 _____ /
14 Jeri Coppa-Knudson, chapter 7 trustee ("Trustee") and John Beach, as trustee of the
15 Beach Living Trust (the "Beach Trust") agree as follows:

16 1. AT Emerald filed its chapter 11 petition on March 4, 2014. The chapter 11 case
17 was converted to chapter 7 on August 29, 2014.

18 2. The Trustee has two years from the original petition date within which to
19 commence avoidance actions under chapter 5 of the Bankruptcy Code.

20 3. The Trustee has identified a potential avoidance action against the Beach Trust.

21 4. The Trustee and the Beach Trust agree that the period of limitations under 11
22 U.S.C. § 546(a) is not jurisdictional and may be extended by agreement. Accordingly,

23 **IT IS STIPULATED** that the period within which the Trustee may commence an
24 avoidance action against the Beach Trust is extended to August 31, 2016.

25 **HARTMAN & HARTMAN**

26 _____ /S/ Jeffrey L. Hartman
27 Jeffrey L. Hartman, Esq. for
Jeri Coppa-Knudson, Trustee

HOLLAND & HART

26 _____ /S/ Timothy Lukas
27 Timothy Lukas, Esq. for
John Beach as Trustee of the
28 Beach Living Trust